

EXHIBIT 35

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHELVILLE DIVISION
1:17-cv-256

SHIRLY TETER,

Plaintiff,

AFFIDAVIT OF JOEL E.
JACOBSON

vs.

PROJECT VERTIAS ACTION FUND,
PROJECT VERTIAS, and
JAMES E. O' KEEFE, III,

Defendants.

Being duly sworn, I, Joel Elijah Jacobson, depose and state as follows:

1. I am legally competent to testify to all matters and I have firsthand, personal knowledge of the matters reflected in the statements set forth herein.
2. I have no medical or emotional condition that affects my ability to recall accurately the matters and recite the statements set forth herein, nor did I at the time of the matters set forth herein.
3. I am Shirley Teter's son and only child. My mother is the plaintiff in the lawsuit described above. I am 47 years old and I am a resident of Asheville, North Carolina. Prior to September 12, 2016 I regularly communicated with my mother and I know her well.

4. On September 12, 2016 I lived in Billings, Montana. I spoke to my mother about what happened to her at the campaign rally of that date shortly after it happened. Within a day or two, the events were broadcast on the internet and in news services, including statements made by a lawyer representing my mother's assailant that my mother "made the whole thing up" and that my mother was a liar.

5. I followed the news closely and monitored statements made about her on the internet thereafter.

6. In late October, 2016, I saw the Project Veritas video "Rigging the Elections" on YouTube that prominently featured my mother within a day or two of it being published. The video had become "viral". Many of my friends also saw it before I did and many saw it after I did. My immediate reaction was that the video defamed my mother, because I knew she was not homeless, mentally ill, a criminal, or a liar. I also knew she was not paid to attend the rally on September 12, 2016, nor trained to ask questions at the rally. My mother was not affiliated in any way with the Hillary Clinton campaign, Americans United for Change, Scott Foval or anyone affiliated with him or those political organizations. My friends and co-workers, some of whom also knew my mother, had the same reaction. People who saw the Project Veritas videos asked me if the statements were true, because they were shocked to see and hear those things, some of whom expressed that they believed my mother was a paid bird-dogger after viewing the Rigging the Elections video.

My mother was, and is, politically independent. She went to the rally on September 12, 2016 not because of her support for candidate Clinton, but she was not supportive of candidate Trump.

7. At that time, I discussed the Rigging the Elections video with my mother and she told me about a local television station news anchor who had visited her about it. I talked with her about specific segments in the video that made the references described paragraph 6. She denied all of the statements made in the video about her.

8. Within a few days, a second video was published by Project Veritas on YouTube, specifically about my mother. It was only a minute and a half long. However, within a few hours of it being published, I saw that viewers began to write vile and threatening comments specifically about my mother. The short video claimed that my mother changed her story after she watched the Rigging the Elections video, and the video conveyed that she was a liar about being assaulted at the rally on September 12, 2016. I shared some of the comments on YouTube that were written about my mother with her. She reported that she viewed the second short video and she was very distressed by it and the comments. I told her to stop reading the comments. Many of the comments I read are attached on to this affidavit as Exhibit A.

9. After the Project Veritas videos, my mother received harassing telephone calls related to her being a paid, trained bird-dogger at the September 12, 2106 rally. I have been with her when she received these calls. I have also been with her since the Project Veritas' videos were published on YouTube and elsewhere when strangers have called her "bird-dogger" while we have been near her apartment building. My mother has reported to me on many occasions how people have given her the "evil eye" or asked her if she was the paid bird-dogger from Asheville or called her a "bird-dogger".

10. I supported my mother's decision to switch from her landline telephone to a cell phone to try to end the harassing phone calls. Her landline was a "bundle": she received telephone, cable and internet from a provider. Before her landline bundle, she previously had owned a government sponsored Tracfone cell phone. She decided to acquire another Tracfone, but that required her to cancel her cable bundle. She needed to replace her internet provider without television service. She was required to purchase entertainment services Netflix and Amazon video to replace cable television entertainment content. Instead of unlimited talk time that was included with her cable bundle, she must now buy minutes each month for her Tracfone.

11. Several months after Project Veritas published the videos, I was returning to Montana and I asked my Aunt Carol Martinson if I could spend the night

and rest at her home in Cheyenne, Wyoming. My Aunt, my mother and I have had difficult inter-personal conflicts in the past, but at this time, I did not think we had a strained relationship of any type. My Aunt Carol and my uncle welcomed me. However, shortly after I arrived, they began criticizing my mother for her attendance at the rally on September 12, 2016. They also expressed that they believed that my mother possibly accepted payment to be an agitator at the rally. Among the many things she said, my Aunt expressed that my mother “had it coming” which I interpreted that she deserved to be punched at the rally, that she deserved the negative YouTube comments and she deserved the lawsuit that had been filed by her assailant, at the Trump rally. After I defended my mother, my Aunt and Uncle became very angry with me and asked me to leave.

12. I have a daughter, Shea, who lives in Arizona. I feel that Shea doubts my mother and is unhappy with me for supporting my mother. Shea has not had any communication with my mother since shortly after Project Veritas published the videos, although I know my mother has tried to communicate with Shea.

13. Downtown Asheville is not very big. Most people who live or work know one-another. Before Project Veritas published these videos, my mother regularly would visit several nearby businesses and cafes. Since Project Veritas published the videos and viewers responded in writing, my mother has become a much different person. She seldom leaves her apartment unless I am with her or she

she is with someone. She has lost the companionship of many of the people she socialized with in the shops and in the cafes.

14. My mother was very distressed and disappointed when the District Attorney dismissed the criminal charges against her assailant in the spring of 2017. My mother has never expressed to me any idea about seeking attention because of what happened at the rally on September 12, 2016. I tried to help her find a lawyer to represent her when she received a threatening letter from a lawyer representing her assailant before that lawsuit was filed, but I was unsuccessful.

15. In early December, 2018 I received a telephone call from a lawyer who initially did not identify himself as representing any specific party in this lawsuit and who I assumed to be assisting my mother. I expressed many of these statements to him at that time. About halfway through that conversation that lawyer identified himself as representing Project Veritas.

This 9th day of January, 2019.

FURTHER AFFIANT SAYETH NAUGHT.


Joel E. Jacobson

SUBSCRIBED AND SWORN TO before me on this 9th day of
January, 2019.


NOTARY PUBLIC

4818-3438-8869, v. 2



persiamotorman

That birddogging Grandma probably has done a lot of other things if a private investigator ever did some "digging".

👍 🌟 🐶



WhiteWolf Wanda Brown

Yeah POOR OLD LADY - she was PAID WELL, they start at \$1500.00 USD

👍 🌟 🐶



bounding street black

granny probably needed the \$1500. The was no social security cost of living increase again this year. She's setting a great example for her grandkids .
(sarcasm) What a piece of work.

👍 🌟 🐶



Dick Tehbut

TheSonic9876 Too damn bad for her she got paid off to lie and will never be able to live that down.

👍 🌟 🐶



Michael Hennesy

Her thirty pieces of silverto betray her own Country and try and help elect a criminal woman President .

👍 🌟 🐶



Pluffpluff

The old women I can forgive, she's sick and most likely needed the money. She most likely signed a contract, so telling the truth is not an option.

* * *



pin4n2

haha...old bitch did it for the cash...we all know it.

* * *



Mein Führer

How disgusting of those liberals brainwashing a poor old lady.

* * *

David A. Moore

~ Not JUST A LIAR, but a DNC-PAID & SUPPORTED LIAR..!!!!**

* * *

Steve Jensen

She's an old druggie living of the taxpayers, while being paid by DNC to lie.

MP USMC BRT

So she straight up lied.

• • •

Madra Simmons

Her

• • •

The Chosen One

What a lying bitch

• • •



smackback58

I hate what she did, and at this point, I question her entire story. Was she hit by anyone? Would anyone hit a woman of this age, wearing an O2 mask, or is this just a sham? I don't know; I hardly think it would happen. What, about her, looked different then? Is the oxygen mask a lie?

• • •

ZealShmeel

You lying fucking CUNT.

• • •

Semper AugustusBubble

This LYING whore is an example of ALL it takes to DESTROY our GREAT COUNTRY. Trump 2016!

• • •

fairbrotherland

The worst kind of whore is a lying whore.

EXHIBIT

tabbies

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991 1

She went from a poor lady to a no good lying bitch.

Ryan Freeman

What a scumbag lying piece sh*t!

This beastly conniver should be tossed in jail for her lies and wrongful persecution of that feeble, legally blind old man she knock off balance which started the incident.



Enimohammed Ibn Al-Israail

[U]nderstand that many of these people being exploited by the "Democrats" are either severely mentally-ill or homeless as Veritas revealed. ...



craxd1

Look at the mentally ill that they were picking up from their cardboard box homes in the cities alleys. They took them to a hotel, gave them a bath and clean clothes, then gave them some cash, and sent them off to the Trump rallies to instigate trouble. That is worse than using old women. Nothing is beneath a Democrat.

Antonio Fletcher



bonesback58

It sounds like they (the Dems) went specifically at disabled people as their, "do-ers". Hilarity seems to think abusing poor people is fine.



septimole

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can anyone verify the background of this lady? possibly homeless or destitute? possibly a bit mentally simple and easily duped. not difficult to understand how she might have been enticed and recruited by the evil sociopath Scott Foval. have seen many like him who eventually literally rot from within.



Mein Fuhrer

I meant I feel bad that she was plucked out of the community by the terrible liberals



Mal Gibson

Creep Gaming Youre probably right. There is no doubt Democrats prey on the weak and feeble minded. "We have mentally ill people who will do shit . .

Confucius

Sick, using sick, old, and autistic people, along with elderly to push your crooked agenda through. Only "progressives" aka crooks can go that low.

johnlocke445

This animal doesn't deserve to have the oxygen she's breathing through her tube. Tie the tube into a knot and let her squirm!

TheLiquidPro

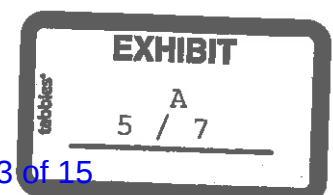
Fucking cut this human garbage's oxygen already.

Mikay Fete

Pull out the plug on that b*tch.

Mikay Wall

Cut her oxygen tank off..let the bitch die Fuckin weasels



• • •

Nathan unknown

Strangle that bitch with her oxygen line then use said oxygen line to drag her behind the Mutineer Hijacked DNC Buss that was dumping liberal shit in the street.

• • •

tegrig0625

Why I oughtta kink her airhose for committing such atrocities! Pisses me off!

• • •

ZealShmael

I bet she doesn't even have COPD.... I'd like to yank that fake ass tube off her face and beat her with her oxygen tank.

• • •

Matthew Rider

Hope someone cold cocks her with a hammer.

• • •



Uey Wahappy

She should be cold cocked now and pay the IRS for the money she didn't pay taxes on.

• • •

Constant Chinner

Lying fucking cunts like her should be in the ground.

• • •

Baronni Kramkin

DIE YOU SCUM!



Death Vader

Kill that idiotic woman.

• • •



Villa

execute this lying slut for treason

ok

no

no



Bryan Miles

Anyone have her address to post online?

